

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

ANDERSON ST. JOHN, individually and on behalf  
of all others similarly situated,

Plaintiffs,

-against-

ADESA, INC.,

Defendant.

Case No. 2:22-cv-01257-GRB-AYS

**DECLARATION OF  
NATALIE MURRAY**

**NATALIE MURRAY** declares pursuant to 28 U.S.C. § 1746, and subject to the penalties of perjury that the following is true and correct:

1. I am Regional Human Resources Director for ADESA, East Region. I submit this declaration in further support of ADESA, Inc.'s ("ADESA") motion to join ADESA NY, LLC ("ADESA NY") as a defendant to this action pursuant to Federal Rules of Civil Procedure 19(a) or 20(a)(2), and to dismiss the Complaint pursuant to Federal Rule of Civil Procedure 12(b)(1). The facts and circumstances set forth in this declaration are based on my own personal knowledge and on my review of ADESA and ADESA NY's respective books and records.

2. ADESA NY is organized under the laws of the State of New York.

3. As of March 8, 2022, when Plaintiff filed his Complaint, ADESA NY was wholly owned by ADESA, Inc.

4. As of today, ADESA NY is wholly owned by ADESA US Auction, LLC, which in turn is owned by Carvana Operations HC, LLC. ADESA, Inc is no longer in ADESA NY's ownership structure. A true and correct copy of ADESA NY's organizational chart, as it appears in the Manager's Certificate, is attached hereto as **Exhibit A**.

5. ADESA NY is responsible for payroll practices with respect to the individuals it employs. Payroll practices vary by state.

6. Human resources officers responsible for each ADESA location sit at that location or in a neighboring location, with reporting lines to District Managers, who in turn report to the Regional Human Resources Director. The human resources officers responsible for the three ADESA NY locations report to Magda Holliday, a District Manager who sits in Massachusetts. Ms. Holliday in turn reports to me, and I sit in Massachusetts as well. This was also the reporting structure immediately prior to the Carvana acquisition.

7. ADESA human resources officers based at ADESA headquarters in Indiana did not directly oversee the human resources functions for ADESA's New York locations, and did not supervise ADESA NY employees.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 19, 2022

  
**Natalie Murray**